



May 20, 2005

The National Organic Standards Board
c/o Arthur Neal; Room 4008 - South Building
1400 Independence Avenue, SW
Washington, D.C. 20250-0001

Sent via Email to: NOSB.Livestock@usda.gov

To the National Organic Standards Board:

Thank you for all your hard work on this issue and I appreciate the ability to voice my comments.

I am an organic dairy farmer on the north coast of California. Our farm became certified organic in 1993 and we began processing organic dairy products from the farm in 1994. We have approximately 280 cows on 660 acres. Our cows are on pasture from the beginning of March until mid-November or whenever the rains begin.

We agree that pasture is an important aspect of herd nutrition and that dairy animals should have regular access to nutritional pasture and the outdoors, including pasture land that is not productive. We feel that pasture is not only a nutritional source but is also important for sunlight and exercise and reducing stress in dairy cows.

We support the use of regional Natural Resources Conservation Service (NRCS) Conservation Practice Standards for Prescribed Grazing (Code 528) for proper conservation methods.

Our main concern is in regards to the text in the NOSB Guidance for Interpretation of §205.239(a) (2) A. Organic System Plan: *The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days..*

We are concerned that these suggested guidelines for dry matter have not come from on-farm research from the varied regions across the country. For example, on our farm, our area gets only approximately 3-4 months of productive pasture each year. The pasture builds, peaks and then drops off by June. We do not irrigate and couldn't if we wanted to as the water supply could not sustain it.



NOSB's suggested dry matter requirements bring up issues which must be considered:

1. *The amount of suggested dry matter figures are hard to obtain and verify.* Different grasses have varying amounts of moisture. Different fields will contain different grasses and different moisture levels, often changing daily with the weather. Amount of rain in each region also affects the amount of grass available. Dry matter contained in each variation is difficult to verify. Suggested calculations on stored feed use per year may not accurately convey dry matter values in pasture.
2. *The suggested amounts are not based on actual nutritional realities or needs of animals.* We need to base these guidelines from on-farm research and real numbers rather than arbitrary figures based on a single region. We suggest we work on the research together with farmers and bovine nutritionists.
3. *Be careful that requirements are not counter-productive.* If the only way to meet pasture requirements in some regions is to irrigate, we would then be supporting an unsustainable system that overuses a limited water resource. We should be careful not to defeat the purpose of having a sustainable agricultural system.

We appreciate the move to clarify the guidelines on pasture and believe this is a positive step. We should just be careful to work logically and not emotionally to create regulations that make sense.

Thank you.

Sincerely,

Albert Straus
Organic Dairy Farmer
President, Straus Family Creamery